

BSF | BOIES
SCHILLER
FLEXNER

MEMO ENDORSED
CRAIG WENNER
Tel.: (212) 909-7625
E-mail: cwenner@bsflp.com

December 13, 2019

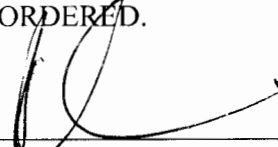
BY ELECTRONIC MAIL

Hon. Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

USDC-SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/13/19

Application granted. The attached exhibit shall be filed under seal.

SO ORDERED.


Ronnie Abrams, U.S.D.J.
December 13, 2019

Re: *United States v. Galanis*, S3 16 Cr. 371 (RA)

Dear Judge Abrams:

I represent Devon Archer. I write to respectfully the Court's permission for Mr. Archer to travel on business from December 17 to 22, 2019, to Spain. The purpose of the proposed trip is to attend meetings for a private investment fund with which Mr. Archer is associated relating to its investments and business activities in foreign markets. As has been the case on each of Mr. Archer's prior travel requests, the Court's Pretrial Services Office consents to this request, but the Government objects. A copy of Mr. Archer's proposed flight and lodging information is attached as Exhibit A, which we respectfully request to be filed under seal.

As the Court is aware, Mr. Archer has travelled internationally with the Court's permission on thirty-three prior occasions, to Jamaica, Italy, England, Spain, France, Latvia, Lithuania, Russia, Kazakhstan, the United Arab Emirates, Vietnam, China, Hong Kong, Malaysia, Singapore, Indonesia, Mexico, the Philippines, the Turks and Caicos Islands, Ukraine, and Serbia. On each and every trip, Mr. Archer has returned on time, and without incident, demonstrating that he is no risk of flight. In particular:

- On June 13, 2016, Your Honor permitted Mr. Archer to travel on business to Italy.
- On July 26, 2016, Your Honor permitted Mr. Archer and his wife, Dr. Archer, to travel on business to Latvia.
- On September 9, 2016, Your Honor permitted Mr. Archer to travel on business to China.
- On October 17, 2016, Your Honor permitted Mr. Archer to travel on business to England and Lithuania. On October 21, 2016, Your Honor further granted permission for Mr. Archer to modify his itinerary to include business travel to Russia.
- On November 28, 2016, Your Honor permitted Mr. Archer to travel on business to England and Spain.

BOIES SCHILLER FLEXNER LLP

BSF

Page 2

- On January 4, 2017, Your Honor permitted Mr. Archer to travel on business to Vietnam and China. On January 17, 2017, Your Honor further granted permission for Mr. Archer to modify his itinerary to include travel to the United Kingdom.
 - On February 16, 2017, Your Honor permitted Mr. Archer to travel on business to Singapore, Malaysia, and the Philippines. Although Mr. Archer's wife did not travel with him, she was permitted to retain her passport because she had a separate international trip planned for the same time.
 - On March 6, 2017, Your Honor permitted Mr. Archer to travel on business to Russian and London. Mr. Archer's wife and his oldest child were permitted to join him in London for that leg of his trip.
 - On March 23, 2017, Your Honor permitted Mr. Archer to travel on business to the Philippines. On that occasion Mr. Archer's family did not surrender their passports because, although they did not travel with him, Mr. Archer's wife and children were out of the country on vacation at the same time.
 - On May 9, 2017, Your Honor permitted Mr. Archer to travel on business to London.
 - On June 6, 2017, Your Honor permitted Mr. Archer to travel on business to London.
 - On June 13, 2017, Your Honor permitted Mr. Archer to travel on business to the Philippines and China.
 - On July 26, 2017 Your Honor permitted Mr. Archer to travel on business to Italy, with one of his children.
 - On September 20, 2017, Your Honor permitted Mr. Archer to travel on business to China, Vietnam, the Philippines, and Kazakhstan.
 - On January 23, 2018, Your Honor permitted Mr. Archer to travel on business to China, Hong Kong, and the United Arab Emirates.
 - On February 16, 2018, Your Honor permitted Mr. Archer to travel on business to Mexico.
 - On March 28, 2018, Your Honor permitted Mr. Archer to travel on business to China.
 - On August 7, 2018, following the jury's verdict in this case, Your Honor permitted Mr. Archer to travel on business to Ukraine.
 - On September 14, 2018, Your Honor permitted Mr. Archer to travel on business to London.
-

BSF

Page 3

- On December 26, 2018, Your Honor permitted Mr. Archer, his wife, and their three small children to travel to Jamaica on vacation.
- On January 7, 2019, Your Honor permitted Mr. Archer to travel on business to England and France.
- On February 17, 2019, Your Honor permitted Mr. Archer to travel on business to Singapore, Indonesia, and Hong Kong.
- On March 20, 2019, Your Honor permitted Mr. Archer and his family to travel to the Turks and Caicos Islands on vacation.
- On April 16, 2019, Your Honor permitted Mr. Archer and his family to travel Mexico on vacation.
- On June 3, 2019, Your Honor permitted Mr. Archer to travel on business to Mexico.
- On June 17, 2019, Your Honor permitted Mr. Archer to travel on business to England.
- On July 10 and 12, 2019, Your Honor permitted Mr. Archer to travel on business to England and Latvia.
- On August 8, 2019, Your Honor permitted Mr. Archer to travel on business to Mexico.
- On August 30, 2019, Your Honor permitted Mr. Archer to travel on business to China.
- On September 17, 2019, Your Honor permitted Mr. Archer to travel on business to Mexico, the Philippines, Serbia, and England.
- On October 17, 2019, Your Honor permitted Mr. Archer to travel on business to England.
- On November 6, 2019, Your Honor permitted Mr. Archer to travel on business to Vietnam and then with his family to Jamaica on vacation.

[See ECF Nos. 41, 62, 78, 83, 84, 98, 111, 122, 148, 162, 166, 179, 182, 185, 189, 236, 305, 316, 363, 560, 620, 711, 715, 730, 738, 745, 770, 774, 776, 778, 780, 793, 804, 808, 814, and 818.]

If the Court permits him to travel, Mr. Archer will report daily to his Pretrial Services Officer while he is away, and of course the open-ended waiver of extradition that Mr. Archer previously signed is still effective. Accordingly, I respectfully request permission for Mr. Archer to take the trips described in the attached exhibit.

BSF

Page 4

Thank you for your consideration of this request.

Respectfully,

/s/ Craig Wenner

Craig Wenner

cc: BY ELECTRONIC MAIL

AUSAs Rebecca Mermelstein and Negar Tekeei

U.S. Pretrial Services Officer Andrew R. Kessler-Cleary
